device can provide a fine display under the normal display mode using all the pixel elements as individual and independent pixels and provide a display with reduced resolution under the memory operation mode to achieve energy saving and compact device design. See, for example, page 14, lines 13-18 and page 15, line 22 - page 16, line 1, of the specification. The Examiner admits that Ishii does not teach or suggest the claimed retaining circuit sharing structure and relies on Kornher for that teaching.

On pages 4-5 of this Action, the Examiner maintains the same rejection as in the previous Action and states "the two references are from the same field and the motivation of combining the two references together is clearly stated in the office action above." Applicants respectfully disagree. The Examiner states that manufacturing cost reduction and the like are the motivation to combine Ishii and Kornher. Applicants point out that such a general incentives, if they are evidence of motivation at all, would not have motivated persons of ordinary skill in the art to combine Ishii and Kornher at the expense of pixel resolution. It would be senseless for persons of ordinary skill in the art to build a display of one million pixels and then reduce the pixel resolution to 250 thousand pixels by sharing four pixels per each retaining circuit, as taught by Kornher. As explained above, the claimed display device has a structure which utilizes the original pixel resolution fully even with the retaining circuit sharing structure in place.

Applicants also point out that Ishii and Kornher are not from the same art, contrary to the Examiner's contention. Ishii teaches a display device in which voltages are applied to the pixel electrodes for displaying images. On the other hand, Kornher describes sharing of a memory cell by a plurality of elements such as other memory cells and activation circuits. Because Kornher's elements work as a memory or an activation circuit, they must be connected to corresponding reset lines 13 for changing their operational states. See, for example, column 2, lines 51-55, of

Kornher. Persons of ordinary skill in the art would have understood that no pixel electrode of a display device is connected to a reset line and that Kornher's teaching of such a reset line connected to the elements, which the Examiner equates to the claimed pixel electrodes, does belong to an art different from the display device art. Accordingly, persons of ordinary skill in

the art would not have been motivated to combine Ishii and Kornher since they belong to

different lines of technology that such persons would not have considered to be applicable to

each other.

The Examiner points out properly that claims 4 and 7 describe structures substantially similar to the structure of claim 1. Thus, Ishii and Kornher together do not teach or suggest the claimed display device of these claims, either. The rejection of claims 1-10 under 35 USC 103(a) over Ishii and Kornher should be withdrawn.

In light of the above, a Notice of Allowance is solicited.

In the event that the transmittal letter is separated from this document and the Patent and Trademark Office determines that an extension and/or other relief is required, applicants petition for any required relief including extensions of time and authorize the Commissioner to charge the cost of such petitions and/or other fees due in connection with the filing of this document to Deposit Account No. 03-1952, referencing Docket No. 492322002500.

Respectfully submitted,

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